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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

APR 3 1985

MEMORANDUM

SUBJECT: Transmittal of Inspection Report

FROM: Robert B. Dona *RB Dona*
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson
Chief, RCRA Branch, WSTM

This memorandum transmits the following RCRA compliance inspection report performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity Number</u>	<u>Areas of Non-Compliance</u>
McDonnell Douglas Corp. Hazelwood, Missouri	MOD000818963	ALF94	<ul style="list-style-type: none">° Inadequate aisle space and container management.° Position descriptions not included in the Personnel Training Plan. Training documentation inadequate.

Attachment

RECEIVED

APR 05 1985

AIR AND HAZARDOUS MATERIAL
DIVISION



R00144318
RCRA RECORDS CENTER

REPORT OF RCRA PERMIT COMPLIANCE INSPECTION

AT

MCDONNELL DOUGLAS CORPORATION
ST. LOUIS TRACT I
P. O. BOX 516
HAZELWOOD, MISSOURI 63166

EPA ID NUMBER: MOD000818963

EPA PERMIT NUMBER: MOD000818963

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division, an EPA permit compliance evaluation inspection was performed at McDonnell Douglas Corporation, St. Louis Tract I in Hazelwood, Missouri, on March 12, 1985. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended and referenced in the Permit, Section I D.8. This narrative report including attachments, present the results of the inspection.

PARTICIPANTS

McDonnell Douglas Corporation, St. Louis Tract I:
J. C. Patterson, Branch Manager Environmental Compliance
Bob H. Kaatman, Acting Supervisor Environmental Compliance
Nancy J. Miceli, Associate Engineer

U.S. Environmental Protection Agency (EPA):
Jo Lynne Moore, Environmental Scientist

Upon arrival at the facility, I requested an audience with Mr. Jerome Patterson, the company contact for all hazardous waste management activities. I introduced myself presenting my credentials and explained the purpose of the inspection. Mr. Patterson indicated that I would need to contact members of the Environmental Compliance Department. I was introduced to Ms. Miceli and Mr. Kaatman who provided compliance information, documentation and conducted a tour of the various hazardous waste storage locations. Mr. Patterson provided information regarding facility operations, various programs and compliance.

At the debriefing session, I provided Mr. Kaatman with a RCRA Inspection Confidentiality Notice, a Document Receipt, and a Notice of Violation which he acknowledged by signing. A claim of confidentiality was not made at the time of the inspection.

FACILITY DESCRIPTION

McDonnell Douglas is primarily a manufacturing site for high technology aerospace products including military fighter aircraft, space systems and missiles. Processes in the fabrication of aluminum, titanium, composite structures and other air frame material include chemical processing tanks, metal cutting, forming and grinding, degreasing, painting, and aircraft fueling. These processes generate a variety of hazardous waste which are stored in tanks or drums prior to recycling or disposal. Tract I transports their hazardous waste and hazardous waste generated off-site to their permitted container storage areas. Off-site waste is only accepted for storage from McDonnell Douglas sites in the St. Louis area. The EPA I.D. number for the 13th McDonnell Douglas generator site is pending MDNR approval. Attachment number 4 depicts the off-site generators by site number(s) and location.

With the exception of the storage area for ammunition and explosives all hazardous waste activities are coordinated and overviewed by Environmental Compliance personnel.

All of the hazardous waste generated at Tract I sites are addressed within the various plans that comprise the attachments to the storage permit. The handling, labeling, transferring, storing, etc. of all hazardous wastes is monitored and documented through the tracking system. The following wastes generated and stored at the Tract I facility are subject to Federal Regulations pursuant to RCRA.

Nitric Acid and Hydrofluoric Acid - The titanium chemical milling process generates waste solution that is hazardous due to corrosivity (D002). This waste is pumped directly from the production area tank to either five 500-gallon aboveground tanks or to six 750-gallon aboveground tanks.

Waste Water Treatment Sludge - Electroplating operations (F006) and chemical conversion coating of aluminum operations (F019) generate sludge that is dewatered prior to disposal. The sludge is piped directly from sludge-accumulating tanks in the wastewater pretreatment plant to the 120,000-gallon in-ground open top tank.

Explosives and Ammunition - Damaged or out-dated ammunition and explosives (reactive hazardous wastes, D003) are stored in a designated section of the building used to store non-waste ammunition and explosives.

Non-hazardous solid waste generated at the facility is burned for heat recovery in accordance with the MDNR issued permit. The trash is hauled in one of two facility trash trucks.

The facility transports hazardous waste from generation and accumulation sites to one of the storage areas. Several vehicles are licensed with MDNR (H1039) for hazardous waste transporting: straight truck with a liftgate, stake/flatbed with liftgate, small trailer, and a 4,000-gallon tanker.

McDonnell Douglas operates a pretreatment plant for wastewater destined to MSD (Metropolitan St. Louis Sewer District). The facility has two National Pollutant Discharge Elimination System (NPDES) permits. MO-0102211 (St. Charles) has one outfall and MO-0004782 has nine outfalls (series number 002 and 004 are the same and series number 008 and 009 were eliminated). The outfalls allow storm water and non-contact cooling water to flow into Coldwater Creek. As specified in the permit, composite and grab samples are acquired monthly and analyzed. The data is submitted to MDNR on a monthly basis.

FINDINGS AND OBSERVATIONS

McDonnell Douglas Tract I in Hazelwood, Missouri submitted a Notification of Hazardous Waste Activity as a generator, transporter and treatment/disposal/storage facility. The Part A application was submitted on November 17, 1980.

A permit for tank and containerized hazardous waste storage was issued through MDNR on June 22, 1984 (permit number OS0 062284 002). A similar storage permit was issued through EPA on August 1, 1984 (permit number MOD00818963).

The Environmental Compliance Department has maintained all manifests utilized for the 12 McDonnell Douglas St. Louis generators. A random sample of manifests were reviewed for completeness and accuracy. No manifest deficiencies were noted. Upon occasion, the facility has had to file a manifest exception report. This report is submitted within the time allowed and resubmitted with the quarterly report to MDNR.

The waste explosive storage facility, storage area number three was not inspected during the course of this permit inspection. Contact could not be easily made with department personnel who manage this storage area since the facility tour was conducted during second shift hours. Environmental Compliance personnel do not maintain keys for access to this area.

Permit Violations

1. In storage area number one several open head drums without the locking rim in place were noted. As described in Section II, Part D. (40 CFR 264.173) of the permit, the drums must be closed during storage. The aisle spacing between drum rows in section one and two of storage area number one, varied between 10 and 18 inches. The original Part B Application indicated that drums containing hazardous waste would be stored single height in rows two drums wide with 18-inch aisles between rows.

Reference Attachment D-1 of the Operations Manual, Part D. Number 3.4, and Section F-4A of Procedures to Prevent Hazards.

2. The 25 drums of hazardous waste in storage area number two were situated four abreast with no aisle space. Section II, Part G.4.(40 CFR 264.35) of the permit specifies that aisle space must be maintained to allow unobstructed movement of personnel.

3. The sump in storage area number two was completely full of liquid at the time of the inspection. Ms. Miceli mentioned that the liquid, presumed to be rainwater was noticed in previous daily inspections. The liquid had not been sampled for analysis as specified in Section D, Process Information, Part D-1a (4). To prevent overflow of the collection system the liquid must be removed from the sump in a timely manner. Reference Permit Section III, Part G.5. (40 CFR 264.175).

4. The containment structure for tanks containing hazardous waste consists of an asphalt base and curbing. Cracks were noted in the curbing surrounding tanks H1 through H6 (waste acid solutions) and tanks H19 and H20 (waste sodium hydroxide regulated by Missouri Hazardous Waste Laws). The curbing must be repaired in order to meet containment conditions specified in the Permit, Section III, Part G. 1-4 (40 CFR 264.175). The integrity of the containment curbs should have been noted on the inspection log for the titanium and aluminum etchant tanks. The Hazardous Waste Storage Areas Inspection Instructions (Permit Attachment II) indicate that the integrity of the containment curbs will be checked on a weekly basis.

5. Emergency Coordinators are listed on Attachment I of the Contingency Plan by the individual's title, name and off-duty telephone number. 40 CFR 264.52(d) states that the Contingency Plan "must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator..." Mr. Kaatman explained the absence of the office telephone number, office address, and home address for each emergency coordinator as a misinterpretation.

6. McDonnell Douglas utilizes films, lectures, handouts, tests and on-the-job training to ensure that facility personnel are able to respond effectively to emergencies and perform their duties safely in a manner which minimizes the possibility of a fire, explosion, or any unplanned release of hazardous waste. The amount of training that an individual receives is dependent upon their involvement with hazardous waste handling activities. This distinction in training is depicted in a titular organization figure (H-1) in the Personnel Training Plan.

The Personnel Training Plan does not include the name of the employee filling each job related to hazardous waste management listed by job title. The plan does not include a written job description for each position specifying requisite skill, education or other qualifications, and duties of employees assigned to each position.

The personnel department tracks all employees by their name and employee number. Information included in this computerized system consists of: name, employee number, building level, room, ext. 1, ext. 2, department, shift, job class, training date, refresher date. This tracking mechanism is not sufficient to document receipt of annual training since the individuals who require training are not identified in the Personnel Training Plan. The tracking mechanism is further complicated by an individual's sporadic involvement with hazardous waste due to reassignment in other departments.

It was apparant from individual training documentation that the annual refresher training did not occur every 12 months. An annual review of required intitial training must occur to comply with the Permit, Section II, Part E and 40 CFR 264.16.

CONCLUSIONS AND RECOMMENDATIONS

The Environmental Compliance Branch of McDonnell Douglas has developed and refined an extensive tracking system to manage hazardous waste generation, handling, transportation, and storage between the Tract I permitted storage areas and the various generators. The system includes several mechanisms to verify each waste and monitor its movement from the time of generation until acknowledgement of final disposition.

Each item in a load destined for a TSDF is sampled for analysis. Samples sent to a contract lab for analysis are returned to the facility and stored in the permitted storage area. The samples are retained until the facility receives acknowledgement of final disposition. The samples are accumulated in separate empty drums which is the start of a new drum of that particular waste. The sample container is rendered "empty" and disposed of accordingly. Describing the arranged handling process of in-house sample analysis and contracted sample analysis would enhance McDonnell Douglas' waste management program. Sample management could be expounded upon in Step 6 of the Waste Analysis Plan or in the description of either process information or operating records.

McDonnell Douglas should revise the procedures for removing, analyzing and storing accumulated materials from the collection areas (sumps) to include time limitations or other mechanisms to assure proper functioning of all containment devices. Reference Procedures to Prevent Hazards, Part F-4b Runoff.

The inspection instructions for hazardous waste storage areas include daily, weekly, monthly or annual criteria for inspections. All inspections of the storage areas are documented on the Daily Inspection Log. It is recommended that complex inspection requirements such as: annually draining and rinsing of the tanks prior to interior inspection for evidence of cracks or structural failure, be documented in a manner that demonstrates compliance. Ms. Miceli mentioned that the hazardous waste storage tanks are inspected when the contents are removed for disposal or recycling.

This appears to be an ongoing inspection process through the maintenance department. Separate documentation, such as a tally sheet like the one used to assure periodic waste analysis, would provide a rapid means to cross check for permit compliance in future inspections.

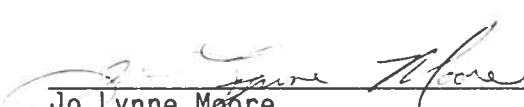
Section H.13. of the Contingency Plan specifies dilution of hazardous material spills with water. The diluted spill is either flushed to the sumps leading to the pretreatment plant or pumped into 55-gallon drums. If it has not been considered, McDonnell Douglas should determine if this spill handling method is applicable to the waste acid tanks: H1-H6 and H12-H16. If applicable, the Contingency Plan should identify water sources near these tanks and other usable material or equipment.


Equipment and material listed in Table G-2 for spill containment and cleanup should include the location of the items if they are maintained separate from the oil spill containment and collection equipment listed in Section II, Insoluble (Floating) Material.

The facility must ensure that containers of hazardous waste are placed in the storage area with enough aisle space to allow thorough inspection of each container. The facility must ensure that all containers remain closed when waste is not being removed or added to the container.

All containment devices must be maintained to prevent overflowing of the containment area.

The Personnel Training Plan must correlate the identified positions with the individual filling the position. The position should be adequately described including; job functions with regard to hazardous waste management, requisite skills, education, etc. Position assignment and individual training documentation should be kept up to date to demonstrate that training reviews are met.


Jo Lynne Moore
Environmental Scientist
Date: 4/1/85
Activity Number: ALF94


Robert B. Dona
Chief, Field Investigations Section
Date: 4-3-85

Attachments:

1. Notice of Violation
2. RCRA Inspection Confidentiality Notice (3 pages)
3. Receipt for Documents
4. McDonnell Douglas Registration Index

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Harwood Pl 63166

EPA ID Number: AD000917960 Date: 5/16/85 Tues.

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
41 CFR 204.51 (d)	Not have met the address of emergency coordinators
204.16 (c)	Excess amount personal property
204.16 (d) 1 & 2	Excessive job done from the federal position not have met educational req.
204.175	Excess drinking in work environment areas
267.35	H17K1120 and H1-H6 Inadequate waste space in clear storage areas min of 18" V
204.175	Keep all work materials above desks keep in place.

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The 10/11/14 is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Mr. J. T. [unclear], Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106. The corrective actions taken by [unclear] will be considered in subsequent enforcement followup. Should 10/11/14 civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response you may call David D. Ho (U.S. EPA) and 816/374-7133, or At Home,
(ALMA), at (314) 451-6769.

This Notice prepared by by J. Lynn Moore Date: 5/12/95

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: B. H. Kastman Date 12 May 61

Signature:

Title:

U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE

2

Name and Address of Inspector(s) <i>Jo Lynne Moore</i> U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Name and Address of Facility <i>McDonnell Douglas Trust I</i> <i>P.O. Box 516</i> <i>St. Louis Mo 63166</i> Owner, Operator, or Agent in Charge Title Address	
Name of Individual to Whom Notice Given <i>R.H. (Rob) Keatman</i>	Title <i>acting super. Engr. Compliance</i>	Date <i>3/12/85</i>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

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RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility <u>Truck I</u> <u>McDonnell Douglas</u>
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If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Air and Waste Management Division
United States Environmental Protection Agency
324 E. 11th Street
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name R. H. KAATMAN

Title Acting Supervisor Environmental Compliance

Signature [Signature]

Date 12 MARCH 85

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name _____

Title _____

Address _____

U.S. ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR SAMPLES AND DOCUMENTS

3

Inspector(s) Name and Address <i>John H. Moore</i> <i>95 Dunston Road</i> <i>Kansas City</i> <i>KS 66115</i>		Firm Name and Address <i>McDonnell Douglas</i>
		Name of Individual <i>R. H. Keatman</i>
		Title <i>Acting Supervisor</i>
Date Collected <i>2/12/85</i>	Samples were:	
	<input type="checkbox"/> Purchased <input checked="" type="checkbox"/> Received no charge <input type="checkbox"/> Borrowed	
Sample Numbers	Amount paid for Samples	
Duplicate Samples Requested		Method of Payment
<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Cash <input type="checkbox"/> Voucher <input type="checkbox"/> To be Billed

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged:

1 copy
regulation index (site #)
ERA print # letter
MDNR print # letter

Signature (Owner, Operator, or Agent) <i>Robert Keatman</i>		Title <i>Acting Supr. Env Compliance</i>
Name of Inspector <i>John H. Moore</i>	Title <i>Envir. Sci</i>	Inspector's Signature <i>John H. Moore</i>

2

U.S. ENVIRONMENTAL PROTECTION AGENCY
324 EAST 11TH STREET
KANSAS CITY, MISSOURI 65106

REQUEST FOR CONFIDENTIAL
TREATMENT

Name of Individual	Title	Date
R. H. Kaatman	Acting Supv. Env. Comp.	3/12/85
Firm Name	Firm Address	
McDermott Douglas Corp	P.O. Box 516 St Louis Mo 63166	

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)		Title
Name of Inspector		Title
John H. Moore		Environ. Sci.
Inspector's Signature		
John H. Moore		

REGISTRATION INDEX
HAZARDOUS WASTE GENERATION SITE NUMBERS

<u>Location</u>	<u>Federal</u>	<u>State</u>
Tract I	MOD000818963	01001
Tract II	MOD000818906	01248
Bldgs. 250-2	MOD000818955	01249
Bldg. 75	MOD000818930	01250
Tract IV	MOD000818971	01251
Bldg. 72	MOD000818922	01252
Bldgs. 90-3	MOD000818918	01253
Tract III	MOD000818914	01254
Bldg. 81	Recycle Ag Sludge	02931
Bldg. 82	MOD980633341	03326
Bldg. 78	Recycle Ag Sludge	03366
Bldg. 240	MOD980859615	04008
Bldg 247	<i>pending</i>	<i>pending</i>

3-12-85
nyneeli